

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO

ERIN E. KIS, on behalf of herself and all others similarly situated, Plaintiff, v. COVELLI ENTERPRISES, INC., Defendant.	Case No. 4:18-cv-00054 JUDGE JAMES S. GWIN MOTION FOR ADMISSION <i>PRO HAC VICE</i> OF RANDALL S. NEWMAN
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MOTION FOR ADMISSION *PRO HAC VICE* OF RANDALL S. NEWMAN

Pursuant to Local Rule 83.5(h), Plaintiffs (“Plaintiffs”), respectfully move this Court for an Order granting Randall Newman of WOLF HALDENSTEIN ADLER FREEMAN & HERZ, LLP to appear *pro hac vice* on behalf of the Plaintiffs in the trial of this action and for all proceedings related thereto. In support of this motion, Plaintiffs aver:

1. Daniel R. Karon is an attorney duly admitted to the Bar of the State of Ohio, authorized to practice before this Court and co-counsel for Plaintiffs.
2. Randall S. Newman is a partner of the law firm WOLF HALDENSTEIN ADLER FREEMAN & HERZ, LLP.
3. Randall S. Newman is a member in good standing of the bars of the State of New York (Bar No. 4078283), the State of California (190547), the State of Ohio (Bar No. 71652 inactive) and the State of New Jersey (Bar No. 6652003 inactive). He is also admitted in the United States Tax Court, the United States Court of Claims, the United States District Courts for the Southern District of New York, Eastern District of New York, Northern District of

California, Central District of California, Eastern District of California, Southern District of California and District of New Jersey and the United States Court of Appeals for the Second, Seventh, Ninth, Eleventh and Federal Circuits

4. There are no disciplinary proceedings pending against Randall S. Newman in any jurisdiction and he has never been the subject of any disciplinary proceeding in any jurisdiction.

5. Plaintiff desires Randall S. Newman to actively participate as co-counsel on her behalf along with counsel of record Daniel R. Karon from Karon LLC for the conduct of trial and all pretrial and post-trial proceedings in this matter.

6. Randall S. Newman understands that admission *pro hac vice* before this Court subjects her/him to the disciplinary jurisdiction of this Court. The Affidavit of Randall S. Newman is attached hereto as Exhibit A in support of this Motion.

WHEREFORE, Plaintiffs respectfully request that this Court grant this Motion for Admission *Pro Hac Vice* of Randall S. Newman.

The *pro hac vice* admission fee is tendered to this Court in accordance with Local Rule 83.5(h).

Dated: January 30, 2018

Respectfully submitted,

/s/ Daniel R. Karon

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Attorney for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on January 30, 2018, a copy of the foregoing was filed electronically with the Clerk of the Court in accordance with the Court's Electronic Filing Guidelines. Notice of this filing will be sent to all registered counsel by operation of the Court's Electronic Filing System. Parties may access this filing through the CM/ECF system.

/s/ Daniel R. Karon

Daniel R. Karon